REMARKS/ARGUMENTS

These remarks are made in response to the final Office Action of August 20, 2007 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due. However, the Examiner is expressly authorized to charge any deficiencies to Deposit Account No. 50-0951.

In the Office Action, Claims 1-19 were rejected under 35 U.S.C. § 112, first paragraph. Additionally, Claims 1-19 were rejected under 35 U.S.C. § 112, second paragraph. Claims 1-19 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Published Patent Application 2004/0003041 to Moore, *et al.* (hereinafter Moore).

Rejections under § 112

In the Office Action, the claims were rejected for including the term "conventional teleconferencing system." The term was objected to as introducing new matter and as indefinite as not being defined or other wise described in the Specification. In this response, Applicants have amended the claims to remove the objected term, rendering these rejections moot. Applicants therefore request withdrawal of these rejections.

Amendments to the Claims

Although Applicants respectfully disagree with the rejections, Applicants nonetheless have amended the claims in order to expedite prosecution of the present application by further emphasizing certain aspects of the claims. Applicants respectfully assert, however, that the claim amendments presented are not intended as, and should not be interpreted as, the surrender of any subject matter. Applicants are not conceding by these amendments that any previously submitted claims are unpatentable over the references of record. Applicants' present claim amendments are submitted only for purposes of facilitating expeditious prosecution of the present Application. Accordingly,

Applicants respectfully reserve the right to pursue any previously submitted claims in one or more continuation and/or divisional patent applications.

In this response, Applicants have amended the independent Claims 1, 8, and 18 to emphasize certain aspects of the claims. In particular, the independent claims have been amended to recite the limitation that the teleconferencing system and the instant messaging system are directly coupled via a speech processing system. Additionally, the claims recite the limitation that the teleconferencing system is a PSTN-based system for receiving calls from PSTN-based telephones. Such amendments are fully supported throughout the Specification. (See, e.g., para. [0014], [0019]). Additionally, Claims 2, 3, 5, 10, 11, 13, 15-17 and 19 have been amended to maintain consistency among the claims. Claims 7, 9, and 12 have been cancelled. No new subject matter has been introduced by these amendments.

Aspects of the Claims

Prior to discussing the cited reference, it may be useful to discuss certain aspects of the claims. The claims recite systems and methods for enabling PSTN-based phone users to participate in an instant messaging based conference using speech input and output using a instant messaging based conferencing system. The claims recite that a PSTN telephone call from a user wishing to participate in an instant message based conference can be placed to a PSTN-based teleconferencing system. Participation is enabled by communicatively linking the PSTN teleconferencing system and an instant messaging system managing the conference. In particular, the teleconferencing system and the messaging system can be directly coupled by a speech processing system.

Once linked to the conference, the PSTN teleconferencing system can receive a speech input from the PSTN telephone and forward the speech input to the speech processing system. The speech processing system can then transcribe the speech input to

a first text message, and the instant messaging system can then transmit the first text message to the plurality of devices participating in the instant messaging based conference. Alternatively, the speech processing system can also receive a second text message from any one among the plurality of devices participating in the instant messaging based conference and convert the second text message to a speech output. The resulting speech output can then be transmitted to the telephone using the PSTN-based teleconferencing system.

Accordingly, the method can provide a consistent, real-time response to messages generated by the telephone user and the plurality of devices. More particularly, by directly linking the teleconferencing system and the messaging system using the speech processing system, delays can be minimized. That is, rather than having to rely on a remote and external speech processing system, delays due to data network traffic are reduced. The claims recite that messages are immediately received by the speech processing system, converted, and forwarded to participants, where any amount of additional delay is solely attributable to conversion time, not transport-plus-conversion time. Furthermore, this configuration can mitigate or eliminate the need to convert messages into one or more formats for secure transport over a data network, thereby reducing the amount of processing needed for format encoding/decoding and, again, reducing processing time.

The Claims Define Over the Cited References

As noted above, independent Claims 1, 8, and 18 were rejected as being anticipated by Moore. Moore discloses a messaging response system which provides services to users via messaging communications. Applicants respectfully disagree with this rejection. Furthermore, Applicants respectfully submit that the claims, as amended, define over Moore.

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First, Moore fails to disclose or suggest a system in which PSTN telephones can directly teleconference into a instant messaging conference. Although Moore makes numerous references to a chat client making "calls" to users on PSTN-based telephones, nowhere does Moore describe a mechanism whereby the reverse can occur. That is, Moore fails to provide any mechanism with which a PSTN telephone would initiate a connection to a chat client, much less an instant messaging conference. Although Moore does discloses that a VoIP call can be established to a chat client, such calls occur only upon the request of a chat client, not of the telephone user. In particular, Moore describes that the VoIP calls occur in response to requests received by the messaging gateway. (See, e.g., para. [0099]-[0102]). In contrast, the claims recite no such limitation. Rather, the claims recite that a PSTN telephone can initiate a call to a teleconferencing system that is communicatively coupled to the instant messaging system so as to participate in the conference and not only in response to a request from a chat client to connect the PSTN telephone to the conference.

Second, Moore fails to disclose or suggest a system in which a PSTN-based teleconferencing system and an instant messaging system can be directly coupled via a speech processing system. As shown in FIG. 1, Moore only discloses linking instant messaging servers 22 indirectly to PSTN devices via one or more other servers or systems located in a network 20. That is, any communications between a PSTN device and the instant messaging server occur using IP packet communications. Furthermore, the speech processing system of Moore, the intelligent media translator 70, is also not directly linked to a PSTN device. Rather, Moore discloses that input speech from PSTN devices is first sent to a VoIP gateway 54 that packetizes the input speech and transmits it over the network 20. The transcription can then occur remotely, and the associated client can then forward the text message to the IM server 22, which can then forward the

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message to other clients. As a result, not only are additional components required by Moore, but additional transmissions over the data network as well.

In contrast, those aspects of the invention claimed require no extra network transmissions or components. Because the PSTN teleconferencing system and the instant messaging system are directly coupled by the speech processing system, the step of preparing the input speech for network transmission is not required. Furthermore, the additional step of first transmitting the input speech to a remote speech processing system is not required. Rather, the PSTN teleconferencing system is directly linked to the speech processing system so as to eliminate the possibility of network delays affecting real-time response of the speech processing system. As a result, network delays in the claimed system and method are limited to only those in transmitting and receiving messages from instant messaging devices; the delays that would be perceived by the participants are minor, being limited to only processing delays of the speech processing system.

Accordingly, Moore, alone or in combination with any other reference of record, fails to disclose suggest or render obvious each and every element of the independent claims, as amended. Applicants therefore respectfully submit that the independent claims define over the references of record. Furthermore, as the remaining claims depend from one of the independent claims while reciting additional features, Applicants submit that the dependent claims likewise define over the references of record.
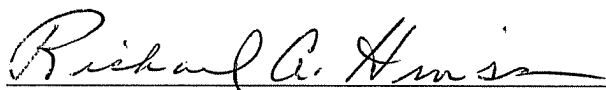
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CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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